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Via ECF and Email (Failla_NYSDChambers@nysd.uscourts.gov)

Judge Katherine Polk Failla, U.S.D.J.
United States District Court Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *Bush Baby Zamagate, Inc. v. Chapter 4 Corp. et al*
Case No. 1:23-cv-08946-KPF

Dear Judge Failla:

This firm represents plaintiff Bush Baby Zamagate, Inc. (“Plaintiff”) in connection with the above-captioned matter. We write, with the consent of all counsel for Defendants Chapter 4 Corp., d/b/a Supreme, Kejuan Muchita Inc., and The Executors of the Albert Jackson Johnson Estate (collectively, “Defendants”), to respectfully request a continuance of the Initial Pretrial Conference pursuant to Fed. R. Civ. P. 16 (the “Rule 16 Conference”), currently scheduled for January 9, 2024 pursuant to Your Honor’s Order of October 30, 2023 (ECF No. 16).

No prior continuance or adjournment requests have been requested or granted with respect to this conference.

We are pleased to report that the parties appear to have reached a settlement in principle of the above matter. The parties will need some additional time to draft, negotiate, and execute a formal settlement agreement. As a result, to allow the parties to focus on finalizing settlement and preserve judicial economy, we respectfully request that the Court adjourn the Rule 16 Conference for at least thirty (30) days.

We thank Your Honor for your attention to this matter and will of course continue to keep the Court apprised of further developments.

Respectfully submitted,

/s/ Abigail J. Remore

Abigail J. Remore

cc: All Counsel of Record (via ECF)